

REMARKS

Claims 3 and 6 have been canceled and their subject matter has been incorporated into claim 1. Withdrawn claims 14-20 have been canceled. Applicant reserves the right to pursue the subject matter of withdrawn claims 14-20 in this or any other application. After entry of the amendments set forth herein, claims 1, 2, 4, 5, and 7-13 will be pending in this application.

Independent claim 1 stands rejected under 35 U.S.C. § 102(e) as anticipated by diGirolamo. This rejection is traversed. Claim 1 has been amended to recite limitations from claim 6, which was indicated as allowable. Claim 1 has not been amended to include the limitations of intervening claim 5 from which claim 6 originally depended; however, applicant respectfully submits that the limitations from claim 6 that have been added to claim 1 are sufficient to patentably distinguish claim 1 from diGirolamo as diGirolamo does not disclose or suggest rods being attached to opposite sides of an upstanding plates. Withdrawal of the rejection of claim 1 and claims 2, 4, 5 and 7-11 which depend therefrom is respectfully requested.

Independent claim 12 also stands rejected under 35 U.S.C. § 102(e) as anticipated by diGirolamo. This rejection is traversed. Claim 12 requires a “first set of ganged studs” connected to first ends of the upper and lower channels and “a second set of ganged studs” connected to second ends of the upper and lower channels. This limitation does not appear to have been specifically addressed in the office action, and diGirolamo does not disclose or suggest sets of ganged studs as required by claim 12. Thus, claim 12 defines patentable subject matter for at least this reason. Moreover, claim 12 has been amended to include a limitation similar to that of claim 6 that the first and second rods do not interfere with each other where they cross. Because claim 12 also recites “threaded blocks in diagonally opposite corners being

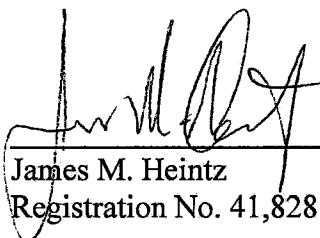
positioned on a same side of respective upstanding plates, the same side being opposite a side of the upstanding plate on which blocks are attached in other corners," it is respectfully submitted that claim 12 also defines patentable subject matter for reasons similar to the reasons why claim 6 was found to be allowable. Accordingly, withdrawal of the rejection of claim 12 is respectfully requested.

Claim 13 was objected to but indicated as containing allowable subject matter. Claim 13 has been rewritten in independent form to include all of the limitations of original claim 12. Accordingly, withdrawal of the objection to claim 13 is respectfully requested.

In light of the above, Applicant submits that this application is now in condition for allowance and therefore request favorable consideration. If any issues remain which the Examiner feels may be best resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact Applicant's counsel, James M. Heintz at 202.861.4167.

Respectfully submitted,

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